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Attorney for Creditor Pension Benefit Guaranty Corporation

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION *et al.*,

Debtors.¹

Case No.: 19-30088

Chapter 11

Jointly Administered

**NOTICE OF APPEARANCE AND REQUEST FOR ELECTRONIC NOTICE
BY THE PENSION BENEFIT GUARANTY CORPORATION**

PLEASE TAKE NOTICE that the Pension Benefit Guaranty Corporation (“PBGC”), a wholly-owned United States Government Corporation under 29 U.S.C. § 1302, an agency of the United States Government under 28 U.S.C. § 451 and 11 U.S.C. § 101(27), and a creditor under 11 U.S.C. § 101(10) in the above-captioned cases, hereby files this Notice of Appearance pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Civil L.R. 11-2, and requests, pursuant to Section 1109(b) of Title 11, United States Code and Bankruptcy Rules 2002(j)(4), 3017(d) and 9007, that notice of all matters which may come before the Court concerning the above-captioned cases and debtors be given to and served upon PBGC at the two e-mail addresses listed below.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: PG&E Corporation [4914] and Pacific Gas and Electric Company [2640]. The Debtors’ mailing address is 77 Beale Street, P.O. Box 770000, San Francisco, California 94177.

1 This request includes, *inter alia*, the notices and papers referred to in Bankruptcy Rules
2 2002, 3017 (including all disclosure statements and plans of reorganization) and 9007, notices of
3 any orders, applications, complaints, demands, hearings, motions, petitions, pleadings or
4 requests, and any other documents brought before this Court in these cases, whether formal or
5 informal, *ex parte* or on notice, written or oral, or transmitted or conveyed by mail, electronic
6 mail, personal delivery, telephone or facsimile, or otherwise.

7 PLEASE TAKE FURTHER NOTICE that this entry of appearance and request for notice
8 is without prejudice to PBGC's rights, remedies and claims against other entities or any
9 objection that may be made to the jurisdiction or venue of the Court or venue of these cases, and
10 shall not be deemed or construed to be a waiver of PBGC's rights: (i) to have final orders and
11 non-core matters entered only after *de novo* review by a district court, (ii) to trial by jury in any
12 proceedings so triable in these cases or in any controversy or proceeding related to these cases,
13 (iii) to have the district court withdraw the reference in any matter subject to mandatory or
14 discretionary withdrawal, or (iv) to assert any other rights, claims, actions, defenses, setoffs or
15 recoupments to which PBGC is or may be entitled in law or in equity, all of which PBGC
16 expressly reserves.

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18 DATED: February 13, 2019
19 Washington, D.C.

Respectfully submitted,

20 /s/ Daniel Robertson
21 Daniel Robertson (FL10108449)
22 Attorney
23 Pension Benefit Guaranty Corporation
24 Office of the General Counsel
25 1200 K Street, N.W.
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efile@pbgc.gov

1 **CERTIFICATE OF SERVICE**

2 This is to certify that a copy of Pension Benefit Guaranty Corporation's Notice of
3 Appearance and Request for Electronic Notice was served on February 13, 2019 to the
4 parties listed below:

5
6 ***Debtors' Counsel via CM/ECF***

7 Tobias S. Keller
8 Keller and Benvenutti LLP
650 California St., #1900
San Francisco, CA 94108

9 ***Debtors' Counsel via Electronic Mail***

10 Stephen Karotkin
11 Jessica Liou
12 Matthew Goren
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153-001

13 ***U.S. Trustee via CM/ECF***

14 Office of the U.S. Trustee
15 Phillip J. Burton Federal Building
450 Golden Gate Ave., 5th Floor., #05-0153
San Francisco, CA 94102

16
17 /s/ Daniel Robertson
Daniel Robertson
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NOTICE OF APPEARANCE
PETITION NO.: 19-30088